

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNIBANK FOR SAVINGS,
Plaintiff,

v.

999 PRIVATE JET, LLC, ELINA
SARGSYAN and EDGAR SARGSYAN
Defendants.

Civil Action No. 4:18-40134

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, the plaintiff, UniBank for Savings (the “Bank”), moves for entry of a preliminary injunction enjoining the defendants, 999 Private Jet, LLC, Elina Sargsyan and Edgar Sargsyan (collectively the “Borrowers”), and their agents, from interfering with the Bank’s enforcement of its rights under an aircraft security agreement. Given that the Borrowers are in default of their payment obligations under the subject promissory note, the proposed preliminary injunction is necessary and appropriate.

In support of its Motion, the Bank refers to its Verified Complaint and Memorandum of Law filed herewith.

WHEREFORE, the plaintiff, UniBank for Savings, respectfully requests that this Court enter an order enjoining the defendants, and their agents, from interfering with the enforcement of its rights under the aircraft security agreement and enjoining the defendants to surrender and deliver the subject collateral to UniBank for Savings or its authorized agent at a location designated by it, and such further relief as this Court deems just.

UNIBANK FOR SAVINGS

By its attorneys,

/s/ Robert B. Gibbons, Esq.

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